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February 29, 2000

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Via Hand Delivery

FEB 29 2000

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001

Re: STB Ex Parte No. 582, *Public Views on Major Rail Consolidations*

Dear Secretary Williams:

Please find enclosed for filing in the above-referenced proceeding an executed original and ten (10) copies of the Comments of The National Industrial Transportation League. Also enclosed is a 3.5-inch diskette containing a WordPerfect 7.0 formatted copy of this filing. An extra copy of the filing is enclosed for stamping and return to our office.

Should you have any questions concerning this filing, please do not hesitate to contact the undersigned. Thank you for your cooperation and assistance in this matter.

Respectfully submitted,

Nicholas J. DiMichael

Nicholas J. DiMichael

Enclosures

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MAIL MANAGEMENT
STB

BEFORE THE

SURFACE TRANSPORTATION BOARD

Ex Parte No. 582

Public Views on Major Rail Consolidations

FEB 29 2000

STATEMENT OF

THE NATIONAL INDUSTRIAL TRANSPORTATION LEAGUE

The structure and operation of the railroad industry is the reason that The National Industrial Transportation League was formed in 1907. In fact, the earliest document in the League's archives is dated April 3, 1907. It is an invitation to a meeting at the Grand Pacific Hotel in Chicago to consider "matters of large importance." Those matters were described in a paragraph titled "Present Conditions Under the Law," which read as follows:

> The passage of the Interstate Commerce Law in 1887 was a compelling force toward consolidation and monopoly by the carriers. The Sherman Antitrust Law makes it a crime to be a monopoly, and the Elkins and Hepburn laws are confessedly laws to regulate monopolies, which the prior laws created and outlawed, a truly inconsistent position.

Much has changed in the past 93 years, but we find ourselves still wrestling with the same basic questions about the proper structure and regulation of the railroad industry. Why?

Despite consistent rhetoric about "free markets," railroads are fundamentally different from other businesses. The vast majority of rail-served facilities are served by only one railroad, and it is practically impossible for a rail competitor to establish direct, physical competition. That is simply the nature of the business, a nature which has spawned a century of debate over the regulation of an industry that is vital to this nation's well-being. A large part of that regulatory debate has focused on mergers and acquisitions within the railroad industry, as government officials have wrestled with the question of how to assure rail service necessary for a strong economy, while simultaneously maintaining financially healthy private railroad companies.

As the government officials on the front line of that debate, the Surface Transportation Board is in a position to shape the future of the U.S. economy, directly and indirectly. Directly through the Board's decisions in merger cases and other matters brought before it. And, indirectly, through the Board's recommendations to Congress regarding the long-term structure of the railroad industry.

The National Industrial Transportation League is pleased to participate in the Board's deliberative process and stands ready to assist in any way possible.

Policy Not Precedent

Over the years, the League has filed thousands of documents in Ex Parte cases before the STB and its predecessor, the Interstate Commerce Commission. Nearly all of those documents have addressed specific legal issues with specific underlying facts. They have been written by talented League attorneys to be reviewed by agency attorneys well versed in transportation law and precedent. However, Ex Parte 582 is a different sort of case. Rather than an analysis of precedent, the Board seeks vision. Rather than ask how things have become the way they are, the Board now asks how the railroad industry should be shaped in the future. Therefore, the

League views this filing in Ex Parte 582 as an attempt to address broad questions about the direction of future public policy, and not a legal brief.

The Surface Transportation Board is to be commended for initiating the process of evaluating the future of the railroad industry now rather than at a time of major crisis. The rail shippers represented by the League fully understand the need to ask questions now that will help policymakers craft policies to assure reliable rail service that is provided fairly and efficiently.

In recent years, since the full implementation of the Staggers Act, a debate has simmered, and sometimes raged, over the lack of direct competition among railroads. The consolidation of the railroad industry has added fuel to the debate. Finally, after numerous railroad mergers have failed to deliver, at least in the short run, the promised benefits of improved service, shippers find themselves staring at another combination of Class I railroads that is being touted as beneficial to rail shippers. Among those shippers, skepticism is rampant. Even though Ex Parte 582 is not about the proposed combination of the Canadian National/Illinois Central and Burlington Northern Santa Fe systems, everyone realizes that the BNSF/CN proposed merger, and the reaction it has generated among rail shippers and the other Class I railroads, is the catalyst for this proceeding.

Development of League Position

As stated earlier, the League is pleased to participate in this proceeding. The League believes that its comments represent the views of a broad range of rail shippers, but the nature of the issues involved in this proceeding makes the League's task more difficult than usual.

It is relatively easy to determine what League members think about a current situation, such as rail service provided by a particular railroad. Likewise, at the appropriate time, the League will implement a straightforward procedure to derive a position on the proposed

CNIC/BNSF combination. The League's Railroad Transportation Committee and Board of Directors will consider the matter and vote, and the majority position will be forwarded as the League's position.

The questions in Ex Parte 582 are much more open-ended than those usually asked by the Board, and seek a vision of the future. Chairman Morgan has publicly enumerated those questions. As the League understands them, they are as follows:

1. Is more rail consolidation good or bad?

2. If more rail consolidation is good (or necessary), when should it occur and under what circumstances?

3. What would be the impact of more mergers on railroad finances, rates, service, capacity and infrastructure?

4. What should the regulatory scheme be for reviewing rail mergers?

5. What is the future for the North American rail network?

To these five critical questions, the League believes strongly that another overriding question must be added: what level and system of economic regulation will produce the most efficient, dynamic railroad service?

There is little sense in debating who the players in the game are without discussing the rules of the game. Unlike other transportation modes, the railroads do not compete freely with each other. That fact has to be in the mind of anyone analyzing the effects of railroad mergers.

Due to the different nature of Ex Parte 582 and the short time frame involved, the views expressed herein are those of the League staff and counsel in consultation with the chairman of the League's Railroad Transportation Committee and the Executive Committee of the League. A full meeting of the Railroad Transportation Committee will be held on April 6, at which time this proceeding and others will be discussed.

The Matrix

As the Board reaches out to railroads and customers to plan the future, one of the more difficult tasks will be to discern what is real. As in the movie, *Matrix*, where the world is artificially created in order to keep humans happy, some of what will be presented in Ex Parte 582 will be artificially created. At least one major Class I railroad has been "coaching" its customers to make filings, even providing sample letters and talking points. In a world where there was no railroad market power, this would be unobjectionable. However, that is not the case today in the railroad industry. The League urges restraint on the railroads, who, in many cases, have economic life or death control over the customers who are receiving their suggestions.

One possible solution for obtaining rail shippers' answers to specific questions would be for the STB to conduct its own survey. Through such a survey, the customers of the railroads could share their opinions without fear of retribution. The League would cooperate with the Board to make such a survey successful.

The Past is Prologue?

For many rail shippers, any future railroad merger will be viewed through the lens of experience in previous mergers. With rare exceptions, that experience has been unsatisfactory. Theoretically, each merger should be judged on its own merits, but the railroads have a welldefined credibility gap when it comes to promises of shipper benefits from mergers. Particularly troubling for shippers are the statements by railroads that mergers are undertaken for shippers. At times, some railroads have even implied that their customers asked them to merge.

In December 1999, the League undertook a survey of the members of its Railroad Transportation Committee, to determine the state of rail service in the United States. The survey asked about rail service on the UP, BNSF, NS, CSX, and CN/IC, both before and after their respective mergers. A copy of the results of that survey are attached to this statement. It should be particularly noted that, of the major mergers of the last five years, results from the survey indicate that the two mergers that should have had sufficient time to produce the benefits promised to shippers (BN/SF and UP/SP) have failed to do so. Substantial majorities (70% to over 90%) of League members responding to the survey say that service is either the same or worse than it was before the merger, depending upon the carrier previously used. Moreover, about half say that rates on the merged carrier are now higher than they were before the merger. From the results of this more formal survey, to innumerable informal expressions of opinion by League members over the past several years, it is clear that League members do not believe that the railroads have delivered on the merger promises made over the past five years.

Despite the "gun shy" nature of many shippers, it is important to assess the future of the overall railroad network from a fresh perspective. Policymakers should analyze the current structure of the railroad industry in terms of capacity, finances, and regulatory regime, and apply that analysis to the questions to be addressed by this case. While shippers' experiences with previous rail mergers make it tempting to have a negative reflex toward future mergers, shippers need to carefully analyze the long and short term implications of any future merger, and be fully engaged in the process of review. To automatically reject all future mergers could condemn shippers to stagnation. Clearly, though, shippers must be convinced that any future mergers will lead to a new level of competition among railroads. Moreover, previous rationales for proposing, and reviewing, mergers are not as relevant when there are only five major carriers, compared to a time when there were 40 or more rail carriers in the United States.

Are Railroad Mergers Inevitable?

Based upon trends in almost every other industry, as well as statements made by practically every railroad executive in North America, it is obvious that the urge to merge appears to be irresistible for the railroads. The real question is, "Will future railroad merger proposals be approved and, if so, under what conditions?"

The Class I railroads are like sports franchises with aging stars. Twenty years ago the Staggers Act revitalized them and a winning streak was born. Today, railroad executives like to talk about protecting their franchises, but as time passes those franchises are being diminished. The price of railroad stock is so low that some companies would be gobbled up and sold off in pieces if they were in an industry without the special protection of the STB. It is time for these franchises to rebuild. Does that necessarily mean combining? No. Ultimate success of the railroads will not be the result of mergers. To simply merge two large stagnant railroads merely produces one larger stagnant railroad. Unless, of course, the combined railroad is too unwieldy to operate efficiently, in which case stagnancy could be replaced by outright failure.

The Future of Railroads

To rebuild their franchises, the railroads must learn to compete in ways they have avoided in the past. For too long, railroads have convinced policymakers that increased head-to-head competition between railroads would be ruinous to their franchises. Worse yet, the railroads have convinced themselves.

The Staggers Act was good for railroads and rail shippers, as it allowed the railroads to shake off the shackles of heavy-handed regulation. In turn, the railroads were able to more creatively construct systems and operations that were more efficient. By so doing, they were able to better serve their customers.

However, the Staggers Act is twenty years old and railroads operate in a different world now.

At the same time the Staggers Act was freeing railroads, the Motor Carrier Act was revamping the motor carrier industry even more dramatically. Motor carriers which had been stifled by regulation similar to that which had been applied to railroads, suddenly were free to compete with each other and with railroads. For a variety of reasons, trucking companies proved far more nimble in changing to meet customers' needs. General merchandise which used to be carried in boxcars now moves by truck. When the Staggers Act was enacted, nobody had heard the term "just-in-time" delivery, but motor carriers have adapted to that system much more readily than have railroads. Only by forming partnerships with motor carriers will railroads gain much of this type of traffic in the future.

As railroads have lost general merchandise traffic, they have relied more on bulk commodities such as coal and chemicals, items which cannot move practically by truck. Can the railroads continue to rely on these commodities to keep them in business? The answer is clearly no.

At a recent seminar co-sponsored by the Brookings Institution and the American Enterprise Institute, a railroad expert noted that at some time in the future, the use of coal will be greatly reduced, either as a result of stricter environmental regulation or technological change. No matter the reason, the day will come when coal is no longer a "cash cow" for the railroads.

Future transportation of chemicals is harder to predict, but chemicals and other commodities such as grain will not generate enough revenue to make the railroads profitable. What happens then? If the railroads try to survive solely on the backs of the remaining commodities, they will fail and drag their customers down with them. To survive, the railroads must become truly competitive with each other. And, they must become a more integral part of the intermodal chain.

Before the railroads can embrace competition, an attitude adjustment is needed. The customer service attitude of the railroads is at an all-time low. "Arrogance" is a term used frequently.

Another change needed is the way the railroads look for new traffic. At the same time that the railroads say that they are trying to "grow the traffic base" by "getting trucks off the highway," for example, they are encouraging more multiple-car and unit train traffic, but in the process chasing away the single-car traffic. However, there is an enormous amount of single car traffic currently being carried by truck. Though "single-car" traffic sounds like "a car here and a car there," some League members who are in the "carload" business ship 30,000 carloads a year to several hundred or more origins and destinations. Such traffic might be difficult for the railroads to handle, but it is a vital part of any plans for the railroads' growth.

The railroads are not without their own potential. As the United States' population and economy grow, more freight will have to be moved. The motor carrier industry is already facing a driver shortage, and highways are becoming congested. Fuel costs are an uncertainty, too. Thus, the railroads have several factors favoring them.

Railroad Capacity

One nagging question about the ability of the railroads to move into the future is, "How much capacity is in the current system?" With technological improvements, how much freight can be carried by the railroads in their current configuration? Against such a benchmark, the STB and others can judge whether future mergers will enhance rail capacity and efficiency. The League suggests that the Federal Railroad Administration and the Surface Transportation Board analyze the capacity question.

Railroad Finances

Some of the Class I railroads are generating impressive free cash flow. Others are not doing much better than covering their operating expenses, partly due to service failures following mergers. Without exception, though, railroads are not viewed as attractive investments for the capital market. They are not seen as part of a growth industry.

How will future mergers change this perception? Based upon the reaction to recent mergers and merger announcements, there is little doubt that future mergers will not reinvigorate railroad finances. Even if a larger, combined railroad can demonstrate some relatively small economies of scale and more efficient operations, the improvements will have a negligible impact in the financial markets.

Railroad Service

If railroads are to prosper, they must drastically enlarge their customer base to include more general traffic. In order to attract more such customers, railroads must improve service. Can that be accomplished through mergers? No. Will rail mergers hurt or help the effort to improve service? That depends upon how well the mergers are implemented, but past experience does not give substantial reason to believe that mergers readily lead to improved service.

The only sure method to improve service is to instill a new attitude in the railroad industry. Right now the prevailing attitude is a fear of competition. Instead, railroads must learn to relish competition. Otherwise they will never know how efficient they can be.

Conclusion

All of the questions posed by Chairman Morgan can be answered differently, and accurately, depending upon how much market competition is allowed to exist within the railroad industry. Perhaps the best conclusion was expressed by Mr. Curt Warfel, Manager, Customer Service & Logistics, Eka Chemicals, Inc., who is chairman of the League's Railroad Transportation Committee. Mr. Warfel, in reviewing these comments, noted the following:

> Under current law and STB policy, it is easy to imagine two or three more end-to-end rail mergers being approved, with any "2-1" shipper problems being remedied by the Board. The result would be two, or at most three, transcontinental railroads. Whether that result will be in the public interest will depend on the extent to which they compete with each other. Clearly, it would not be in the public interest if they did not. However, if there were a change in the rules of the game to make them compete, such as the Canadian system of interswitching and competitive rates over bottlenecks, then two or three such railroads might actually be preferable to the larger number of railroads of today.

Mr. Warfel's statement highlights the challenge facing the STB and Congress. Without a fundamental change in the marketplace, mergers are merely ripples in a stagnant pond. But, if railroads are energized by the forces of competition, then the industry will become a flowing river of commerce.

Respectfully submitted,

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Submitted by :

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February 29, 2000

THE NATIONAL INDUSTRIAL TRANSPORTATION LEAGUE

RESULTS OF DECEMBER 1999 RAIL MERGER SURVEY

Norfolk Southern Railway Co.
CSX Transportation Co.
Union Pacific Railroad Co.
Burlington Northern Santa Fe Railway Co.
Canadian National/Illinois Central Railroads

In December 1999, the League surveyed the members of its Railroad Transportation Committee regarding the state of rail service in the United States. 184 surveys were distributed, and 50 were returned. The survey asked for information on service on NS, CSX, UP, BNSF, and CN/IC.

PART I OF SURVEY – SHIPPERS' RAIL SERVICE EXPERIENCE

A. CSX/Norfolk Southern

The following questions were answered by League members who currently utilize NS and/or CSX for part or all of their rail service. Of the total number of responses received, 86%, or 43 respondees, reported that they used NS rail service, and 88%, or 44 respondees, reported that they used CSX rail service. The answers of the respondees who use either NS and/or CSX rail service follow.

1. Select the term that describes your service on the named carrier from November 1, 1999 to date:

Of those using NS and/or CSX, the following percentages for each answer were reported:

NS:	0%	Excellent	CSX:	0%	Excellent
	5%	Good		11%	Good
	32%	Fair		39%	Fair
	63%	Poor		50%	Poor

2. Is your service since November 1 the same, better or worse compared to your service before June 1, 1999 (including service before June 1 on the former Conrail)?:

Of those using NS and/or CSX, the following percentages for each answer were reported:

NS:	0%	Better	CSX:	0%	Better
	9%	Same		11%	Same
	91%	Worse		89%	Worse

3. If you have encountered service problems since November 1, 1999 please check as many as apply:

Of those using NS and/or CSX, the following percentages for each answer were reported:

NS:	82%	Lost /delayed shipments	CSX:	84%	Lost / Delayed shipments
	40%	Inadequate car supply		44%	Inadequate car supply
	46%	Data/EDP problems		44%	Data/EDP problems
	54%	Poor customer communications		55%	Poor customer communications
	12%	Other		10%	Other

4. If your service problems are particularly severe in one or more areas, cities, or terminals/yards, specify those locations:

On NS:	**53 terminals were listed. Of these 33 were listed once, and 20 terminals were listed from 2 to 9 times. Most frequently named were Buffalo NY, Elkhart IN, Conway PA, Chicago, Roanoke VA, Decatur IL, and Allentown, PA**
On CSX:	**51 terminals were listed. Of these 33 were listed once, and 18 terminals were listed from 2 to 10 times. Most frequently named were Chicago, Selkirk NY, Buffalo NY, Toledo OH, Philadelphia, Avon, OH, and Willard OH**

5. As a result of any service problems that you have had since June 1, have you experienced any of the following?

Of those using NS and/or CSX, the following percentages for each answer were reported:

77%	**Used truck at a higher transportation cost**
38%	**Incurred increased storage charges**
48%	**Incurred increased charges or costs for railcars**
31%	**Curtailment of your plant operations**
16%	**Shutdown at your plants**
50%	**Curtailment of customer's operations**
27%	**Customer plant shutdown**
17%	**Other**

6. If you have experienced service problems on either NS or CSX since June 1, please give an estimate as to the damages or amount of money that your company has lost as a result of these service problems.

66% of respondents using NS and/or CSX answered this question.
The average estimate of damages was $2.3 million.

7. If your company has suffered damages or monetary losses since June 1 as a result of service problems on NS or CSX, please check as many as apply:

Of those using NS and/or CSX, the following percentages for each answer were recorded

29%	**My company has filed a claim with either NS or CSX or both**
44%	**My company is planning to file a claim with either NS or CSX or both**
25%	**My company is not planning to file a claim with either NS or CSX**

8. Compared to the rates charged during the last quarter of 1998 for service on NS or CSX, in general are your rates now:

Over 90% of respondents using NS and/or CSX responded to this question. Of those responding to the question:

On NS: **26% said "higher than they were then" by an average of 5.1%**
56% said "remained about the same"
18% said "lower than they were then" by an average of 13%

On CSX: **28% said "higher than they were then" by an average of 5.5%**
42% said "remained about the same"
30% said "lower than they were then" by an average of 8.1%

B. Union Pacific

The following questions were answered by League members who currently utilize UP for part or all of their rail service. Of the total number of responses received, 94%, or 47 respondees, reported that they use UP rail service. The answers of the respondees who use UP rail service follow.

1. Select the term that describes your service on the merged UP from June 1, 1999 to date:

   Of those using UP, the following percentages for each answer were reported:

6%	**Excellent**
36%	**Good**
53%	**Fair**
2%	**Poor**

2. This question asks you about service on the former UP and the former SP in the period just before their merger in 1996, compared to now. Check the box(es) that apply(ies):

   a) In the first half of 1996 (immediately before the UP and SP merger was approved), I utilized rail service on the former UP. Compared to then, service on the merged UP is now.

   Of the 46 respondees that used UP, the following percentages for each answer were reported:

6%	**Better**
61%	**Same**
33%	**Worse**

   b) In the first half of 1996 (immediately before the UP and SP merger was approved), I utilized rail service on the former SP. Compared to then, service on the merged UP is now.

   Of the 43 respondees that used SP, the following percentages for each answer were reported:

30%	**Better**
47%	**Same**
23%	**Worse**

3. Compared to the rates during first half of 1996 on either UP or SP, in general are your rates on the merged UP now:

50%	**said "higher than they were then" by an average of 9.1%**
41%	**said "remained about the same"**
9%	**said "lower than they were then" by an average of 12.5%**

C. BNSF

The following questions were answered by League members who currently utilize BNSF for part or all of their rail service. Of the total number of responses received, 90%, or 45 respondees, reported that they use BNSF rail service. The answers of the respondees who use BNSF rail service follow.

1. Select the term that describes your service on the merged BNSF from June 1, 1999 to date:

   Of those using BNSF, the following percentages for each answer were reported:

   7% Excellent
   60% Good
   31% Fair
   2% Poor

2. This question asks you about service on the former BN and the former SF in the period just before their merger in 1995, compared to now. Check the box(es) that apply(ies):

   a) In the first half of 1995 (immediately before the BN and SF merger was approved), I utilized rail service on the former BN. Compared to then, service on the merged BNSF is now.

   Of the 41 respondees that used BN, the following percentages for each answer were reported:

   22% Better
   59% Same
   19% Worse

   b) In the first half of 1995 (immediately before the BN and SF merger was approved), I utilized rail service on the former SF. Compared to then, service on the merged BNSF is now.

   Of the that 38 respondees that used SF, the following percentages for each answer were reported:

   21% Better
   50% Same
   29% Worse

3. Compared to the rates during first half of 1995 on either BN or SF, in general are your rates on the merged BNSF now:

   49% said "higher than they were then" by an average of 6.6%
   22% said "remained about the same"
   29% said "lower than they were then" by an average of 7.1%

D. CN/IC

The following questions were answered by League members who currently utilize CN/IC for part or all of their rail service. Of the total number of responses received, 62%, or 31 respondees, reported that they use CN/IC rail service. The answers of the respondees who use CN/IC rail service follow.

1. Select the term that describes your service on the merged CN/IC from June 1, 1999 to date:

   Of those using CN/IC, the following percentages for each answer were reported:

   6% Excellent
   48% Good
   36% Fair
   10% Poor

2. This question asks you about service on the former CN and the former IC in the period just before their merger in 1999, compared to now. Check the box(es) that apply(ies):

   a) In the first half of 1999 (immediately before the CN and IC merger was approved), I utilized rail service on the former CN. Compared to then, service on the merged CN/IC is now.

   Of the 27 respondees that used CN, the following percentages for each answer were reported:

   4% Better
   92% Same
   4% Worse

   b) In the first half of 1999 (immediately before the CN and IC merger was approved), I utilized rail service on the former IC. Compared to then, service on the merged CN/IC is now.

   Of the 29 respondees that used IC, the following percentages for each answer were reported:

   3% Better
   83% Same
   14% Worse

3. Compared to the rates during first half of 1999 on either CN or IC, in general are your rates on the merged CN/IC now:

   25% said "higher than they were then" by an average of 4.4%
   71% said "remained about the same"
   4% said "lower than they were then" by an average of 2%

PART II OF SURVEY – TRANSIT TIMES

Part II of the League's survey asked Railroad Transportation Committee members about current transit times in the month prior to the railroad's merger, compared to transit times in the same month of 1999. Members were asked to select five origin-destination pairs on which they used rail service before the merger, and on which they still use rail service today, and that they believed were representative of service over the merged carrier today. A representative movement was not to be a minor, one-time, or sporadic movement. Respondents were asked to specify particular origin-destination pairs, and record their average transit time in days between the origin and destination during the two time periods.

NS and CSX Transit Times

29 NITL Rail Committee members shipping over NS and 31 NITL Rail Committee members shipping over CSX responded to this part of the survey. These included some of the largest shippers in the country, transporting a wide variety of commodities, including chemicals, oil, minerals, metals, farm products, paper, scrap, and others.

Coincidentally, for both NS and CSX, data on more than one-hundred separate origin-destination pairs were provided.

For NS, the data showed that the average transit time for the 115 reported movements increased 64% between October 1998 and October 1999, from 8.3 days on average to 13.6 days on average.

For CSX, the data showed that the average transit time for the 109 reported movement increased 49% between October 1998 and October 1999, from 8.6 days on average to 12.8 days on average.

UP Transit Times

20 NITL Rail Committee members shipping over UP responded to this part of the survey. These included some of the largest shippers in the country, transporting a wide variety of commodities, including chemicals, oil, minerals, metals, farm products, paper, scrap, and others.

The data showed that the average transit time for the 74 reported movements increased 13% between June 1996 and June 1999, from 7.5 days on average to 8.5 days on average.

BNSF Transit Times

18 NITL Rail Committee members shipping over BNSF responded to this part of the survey. These included some of the largest shippers in the country, transporting a wide variety of commodities, including chemicals, oil, minerals, metals, farm products, paper, scrap, and others.

The data showed that the average transit time for the 52 reported movements decreased 9% between June 1995 and June 1999, from 8.8 days on average to 8.0 days on average.